# Working Paper 151

Review of Climate Budget and Recommendations for Climate Public Finance Management in Bangladesh

> Fahmida Khatun Foqoruddin Al Kabir



### REVIEW OF CLIMATE BUDGET AND RECOMMENDATIONS FOR CLIMATE PUBLIC FINANCE MANAGEMENT IN BANGLADESH

CPD Working Paper 151

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Publisher

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The present paper titled **Review of Climate Budget and Recommendations for Climate Public Finance Management in Bangladesh** has been prepared by by *Dr Fahmida Khatun*, Executive Director, CPD (fahmida@cpd.org.bd); and *Mr Foqoruddin Al Kabir*, Research Associate, CPD (kabir@cpd.org.bd).

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- 1. Bangladesh faces severe consequences of climate change, including rising sea levels and extreme weather events, leading to profound social and economic consequences. Recognising the urgency to battle climate change and protect millions of people from its impacts in the country, the Government of Bangladesh (GoB) has implemented various initiatives encompassing mitigation, adaptation, and international co-operation. Despite these efforts, substantial financing is required. For instance, implementing the National Adaptation Plan (NAP) alone will require USD 230 billion from 2023 to 2050. The government acknowledges the need for significant international support, with at least USD 6.0 billion per year from external sources. However, there is a considerable gap in climate-related expenditures, highlighting the urgency for effective financing mechanisms. Green Public Financial Management (PFM) emerges as a crucial strategy, involving the integration of climate-friendly perspectives into budgetary processes to align fiscal policies with environmental objectives. This study aims to review the legal and policy framework on climate change and climate budget of Bangladesh and suggests recommendations for effective climate public finance management.
- 2. The legal and policy framework on climate change of Bangladesh serves as a crucial response to one of the most pressing global challenges of the present time. The framework encompasses a comprehensive set of laws, regulations, and policies aimed at mitigating adverse climate change effects, enhancing adaptive capacity, and fostering sustainable development. Key climate related government documents include the Bangladesh Environment Conservation Act of 1995, the National Adaptation Programme of Action (NAPA), the Bangladesh Climate Change Strategy and Action Plan (BCCSAP) of 2009, and the establishment of the Climate Change Trust Fund (CCTF) in 2010. Initiatives like the Climate Public Expenditure and Institutional Review (CPEIR) in 2012 and the subsequent Climate Fiscal Framework (CFF) of 2014 highlight the country's commitment to integrating climate considerations into fiscal and institutional frameworks. The country has also developed several long-term strategic plans, such as the Bangladesh Delta Plan 2100 in 2018, Mujib Climate Prosperity Plan (MCPP) up to 2030 in 2021, and the National Adaptation Plan (NAP) in 2022, outlining tailored strategies across sectors. These initiatives, anchored in international agreements and driven by domestic laws, reflect Bangladesh's determination to build a resilient and sustainable future for the country through a focus on adaptation, mitigation, and international co-operation.
- 3. The CFF and Climate Budget in Bangladesh serve as an overarching strategy to align fiscal decisions with climate action, ensuring the intertwining of economic priorities with environmental resilience. Following the recommendations of the CPEIR in 2012, the development of the CFF began in 2014, aiming to estimate costs, prioritise climate actions, access national and international sources for climate finance, deliver climate finances, track expenditures, and ensure accountability. Over time, the CFF has evolved to align with new development strategies and involve various stakeholders, including the private sector, Non-Governmental Organisations (NGOs), and Civil Society Organisations (CSOs).

Despite increased budgetary allocations for the climate-related activities over the years, the utilisation rate shows a fluctuating trend. The budget allocation for the Ministry of Environment, Forest, and Climate Change (MoEFCC) has remained behind the targets stated in the Eighth Five Year Plan (8FYP). Although allocations for environmentally friendly and sustainable infrastructure, such as road transport and highways, have increased, concerns persist regarding the prioritisation of thematic areas and the fluctuating utilisation rates for the climate-related activities.

The allocation for renewable energy in the Annual Development Plan (ADP) shows a fluctuating trend. In FY24, the allocation for renewable energy is only 3.08 per cent, which raises concerns about achieving the target of 40 per cent power generation from clean energy by 2041. Additionally, a Climate Budget has been allocated for Social Safety Net Programmes (SSNPs), further extension of this budget is needed, especially considering the need to address climate change-induced migration.

- 4. The government is committed to aligning policies, initiatives, and progress across various sectors, forming a unified approach to climate mitigation and adaptation. Key initiatives include mobilising resources for the CCTF, aiming to increase it significantly in the 8FYP, and utilising the Green Climate Fund (GCF) to support projects enhancing climate resilience. The commitment to third-party monitoring of the CCTF demonstrates a dedication to transparency and responsible utilisation of climate finance. Besides, the formulation and advancement of the NAP signify Bangladesh's proactive approach to integrating climate change adaptation into broader national development goals. Efforts to understand climate change at the local government level and address climate-induced migration are noteworthy, though concerns exist about the allocation of resources for climate vulnerable populations. The commitment to renewable energy and the focus on gender-transformative climate action, as outlined in the Bangladesh Climate Change and Gender Action Plan (ccGAP), reflect a comprehensive and inclusive approach. The allocation for the Ministry of Environment, Forest, and Climate Change (MoEFCC) remains a challenge because it falls behind the target and owns potentials to hinder effective implementation of environmental and climate policies. The methodology for tracking climate finance through the Climate Public Finance Tracking (CPFT) tool represents progress. However, there are certain areas for improvement, including rationalising the distribution of weight for climate change relevance. Bangladesh is marching towards green budgeting and the integration of components of Green Public Financial Management (PFM) are significant, but a more comprehensive approach is needed to ensure effective budget execution, accountability, and public participation at all stages. The Green PFM represents a strategic framework aligning public expenditure, revenue generation, and budgetary processes with ecological imperatives, contributing to a sustainable and resilient future.
- 5. Following a comprehensive review of legal and policy frameworks on climate change and climate budget in Bangladesh, this study presents key recommendations for the Green PFM in the country. It emphasises the need for Bangladesh to transition from its foundational climate PFM mechanisms to a more comprehensive framework, incorporating transparent evaluation of public expenditures' environmental impact and robust mechanisms for monitoring green initiatives. Capacity development is identified as a crucial requirement for effective project design and resource mobilisation to address climate challenges. The study also underscores the importance of enhancing utilisation of the development climate budget through a multi-faceted approach. The approach needs to be a blend of project preparation, capacity building, transparency, public engagement, and private sector involvement. Clarity and transparency in project tagging within the BCCSAP thematic areas are urged to align projects with climate objectives and foster accountability. Furthermore, the integration of private sector financing into the existing CPFT system is highlighted as a pivotal step to diversify funding sources and infuse innovation into climate initiatives. The study recommends a holistic reform of climate budgeting, making it an all-encompassing strategy aligned with national priorities to effectively address climate challenges and promote sustainable development. Integration with the PFM reform is proposed as a strategic approach, with the Ministry of Finance (MoF) taking the lead and engaging other ministries, private sector, NGOs, CSOs, and communitybased organisations in the reform process. Capacity development for relevant human resources is stressed for improved integration of climate budget tagging into the national budget process. It will also enhance tracking of climate-related expenditures. Overall, the study advocates for a collaborative and comprehensive approach to climate budgeting reform in Bangladesh to maximise the impact of climate finance, ensure financial accountability, and advance climate resilience and sustainability goals.

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## Acronyms

ADP	Annual Development Plan
BCCSAP	Bangladesh Climate Change Strategy and Action Plan
BDT	Bangladeshi Taka
ccGAP	Climate Change and Gender Action Plan
CCTF	Climate Change Trust Fund
CFF	Climate Fiscal Framework
CPD	Centre for Policy Dialogue
CPEIR	Climate Public Expenditure and Institutional Review
CPFT	Climate Public Finance Tracking
CSOs	Civil Society Organisations
CVF	Climate Vulnerable Forum
EU	European Union
FFW	Food For Work
GCF	Green Climate Fund
GDP	Gross Domestic Product
GoB	Government of Bangladesh
LGD	Local Government Division
LGI	Local Government Institutions
MCPP	Mujib Climate Prosperity Plan
MoA	Ministry of Agriculture
MoDMR	Ministry of Disaster Management and Relief
MoEFCC	Ministry of Environment Forest and Climate Change
MoF	Ministry of Finance
Mol	Ministry of Industries
MoWR	Ministry of Water Resources
NAP	National Adaptation Plan
NAPA	National Adaptation Programme of Action
OECD	Organisation for Economic Co-operation and Development
PFM	Public Finance Management
RTHD	Road Transport and Highways Division
SDGs	Sustainable Development Goals
SIDA	Swedish International Development Cooperation Agency
SSNP	Social Safety Net Programme
UNCDF	United Nations Capital Development Fund

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UNDP	United Nations Development Programme
UNFCCC	United Nations Framework Convention on Climate Change
USD	United States Dollar
VAT	Value Added Tax
VGF	Vulnerable Group Feeding
WFM	Work for Money

#### **1. INTRODUCTION**

Being one of the most vulnerable nations in the world to the effects of climate change, Bangladesh contends with rising sea levels, increasingly severe weather events, and a myriad of cascading consequences that affect every element of the country and its populations. Physical, economic, and social consequences of climate-related hazards are not abstract concepts in this context; they are immediate, pervasive, and intricately interwoven with daily life (Alam et al., 2017; Islam, 2018; Rokonuzzaman & Hattori, 2022: among others). The country's ongoing struggle against these obstacles serves as a stark reminder of the importance of global and national climate action, as the stakes could not be higher for the millions of people whose lives are seriously influenced and endangered by the constant threat of a changing climate.

The Government of Bangladesh (GoB) has recognised the pressing need to address the impact of climate change and has undertaken various initiatives, which are reflected in national strategic plans and policies. The GoB has adopted a multi-pronged approach that encompasses mitigation, adaptation, and international co-operation to combat the challenges posed by climate change for the country. These initiatives range from enhancing disaster preparedness and improving infrastructure resilience to promoting climate-smart agriculture and sustainable urban development. However, the need for finance in tackling the climate change related challenges is huge. For instance, the Ministry of Environment Forest and Climate Change (MoEFCC) formulated the National Adaptation Plan (NAP) in 2022. The need for USD 230 billion from 2023 to 2050 for implementing the NAP in Bangladesh underscores the significant financial commitment required to address the growing challenges posed by climate change in the country. Developing climate resilience will require seven times the current spending at a rate of USD 8.5 billion per year, with USD 6.0 billion per year from external sources or international climate funds and development partners (MoEFCC, 2022). The need for at least USD 12.5 billion by 2025, amounting to approximately 3 per cent of Bangladesh's Gross Domestic Product (GDP), signifies the urgency and scale of climate action required in the medium-term (World Bank, 2022). These numbers indicate Bangladesh will need a large amount of financing for climate action both in the medium and long-term period. However, a large gap still exists in climate-related expenditures despite national and global commitments on climate finance. Public expenditure is an important aspect of climate finance, which can serve as a cornerstone for mobilising additional climate funds from various sources.

In this regard, the Green Public Financial Management (PFM) is a vital strategy for improving the allocation of public expenditures through green fiscal measures which are aligned with climate and environmental objectives. Green PFM refers to the integration of an environment and climate-friendly perspective into the PFM processes, systems, and frameworks, particularly the budget process to promote climate and environment sensitive fiscal policies (Gonguet, 2021; Sakrak, 2022). The Organisation for Economic Co-operation and Development (OECD) established the Paris Collaborative on Green Budgeting in 2017 which subsequently created an inventory of green budgeting building blocks and successful national experiences, particularly in advanced economies (OECD, 2021). However, green PFM practices remain nascent in most countries, including the advanced economies. Against the backdrop, this working paper reviews the legal and policy framework on climate change and climate budget in Bangladesh and recommends policy action for climate public finance management for a sustainable future.

#### 2. LEGAL AND POLICY FRAMEWORK ON CLIMATE CHANGE IN BANGLADESH

Undoubtedly, climate change is one of the leading global challenges of the current time. The legal and policy framework on climate change in Bangladesh represents a critical response to this challenge. Bangladesh, a country that is geographically susceptible, has acknowledged the urgent need to address the multifaceted impacts of climate change. This framework encompasses a comprehensive set of laws, regulations, and policies that aim to mitigate the adverse effects of climate change, enhance adaptive capacity, along with fostering sustainable development. With its commitment to international agreements such as the Paris Agreement, and its recognition of climate change as a cross-cutting issue, the legal and policy framework of Bangladesh stands as a testament to the country's dedication in safeguarding both its population and environment from the far-reaching impacts of a changing climate. Against the backdrop, a brief overview is carried out on the key components of the country's legal and policy response to climate change. Figure 1 below shows the overview of legal and policy framework on climate change.

Bangladesh introduced its Environment Conservation Act in 1995 with the objectives to support environmental protection, improve environmental standards, control, and reduce environmental pollution (MoEF, 1995). The act stands as a cornerstone in the country's efforts to balance economic growth with environmental sustainability. Enacted as a response to the escalating environmental challenges facing by the country, this pivotal legislation reflects Bangladesh's commitment to safeguarding its natural resources and ecosystems. In 2005, the National Adaptation Programme of Action (NAPA) was formulated to address Bangladesh's climate change challenges. It outlines

Bangladesh Environment Conservation Act (1995)	National Adaptation Programme of Action (2005)	Bangladesh Climate Change Strategy and Action Plan (2009)	Climate Change Trust Fund Act (2010)
Climate Public Expenditure and Institutional Review (CPEIR) (2012)	Climate Fiscal Framework (2014)	Nationally Determined Contributions (2015)	Climate Public Finance Tracking in Bangladesh (2018)
Bangladesh Delta Plan 2100 (2018)	Bangladesh's Country Programme for Green Climate Fund (GCF) (2018)	8th Five-year Plan (2021-2025)	Updated Climate Fiscal Framework (2020)
Nationally Determined Contributions (2021)	Mujib Climate Prosperity Plan (2021-30)	National Adaptation Plan (2022)	Policy for Green Bond Financing for Banks & FIs

#### Figure 1: Legal and Policy Framework on Climate Change in Bangladesh

Source: Authors' compilation.

a strategic roadmap to prioritise urgent adaptation measures, focusing on vulnerable sectors and populations, in line with international agreements.

The Bangladesh Climate Change Strategy and Action Plan (BCCSAP) of 2009 is one of the key initiatives in addressing the climate change. The BCCSAP stands as a comprehensive and forward-looking blueprint in the country's relentless pursuit of addressing the challenges posed by climate change (MoEF, 2009). Recognising the urgent need to integrate climate considerations into its development trajectory, Bangladesh embarked on a journey to formulate a strategic framework that would guide its efforts towards climate resilience and sustainable growth. Following the BCCSAP, the Climate Change Trust Fund Act of 2010 signifies a key step taken by Bangladesh to institutionalise its commitment to addressing the urgent challenges presented by a changing climate (MoEF, 2010). Recognising the need for a dedicated financial mechanism to support climate adaptation and mitigation initiatives, Bangladesh established the CCTF in 2009 as a robust and transparent platform.

The Climate Public Expenditure and Institutional Review (CPEIR) was conducted in 2012. The CPEIR was a significant milestone in the nation's pursuit of integrating climate considerations into Bangladesh's fiscal and institutional frameworks (GED, 2012). Following the recommendations of the CPEIR, the CFF was formulated in 2014 that marks a significant stride in the realm of climate-responsive financial management, underscoring the commitment of the government to allocate resources effectively in the face of climate change (MoF, 2014). The CFF facilitated in publishing the first climate budget of Bangladesh in 2017. The comprehensive methodology for preparing climate budget was published in 2018 titled 'Climate Public Finance Tracking' (CPFT) in Bangladesh. This methodology offers a comprehensive means to assess the effectiveness of climate-related expenditures, ensuring resources are channelled towards initiatives that promote resilience, sustainable development, and the well-being of its communities (MoF, 2018).

Besides, the country has a long-term comprehensive strategic plan like Bangladesh Delta Plan 2100, Mujib Climate Prosperity Plan (MCPP) up to 2030, and the NAP (2022). These embody a holistic and forward-looking approach, outlining Bangladesh's tailored strategies, policies, and actions to enhance its adaptive capacity across sectors including agriculture, water resources, infrastructure, and healthcare. Bangladesh has made significant strides in developing a comprehensive legal and policy framework to address the urgent challenges posed by climate change. Mainly focusing on adaptation, mitigation, and international co-operation, the country has demonstrated a commitment to safeguarding its environment, economy, and the well-being of its citizens. Anchored in international agreements like the Paris Agreement and driven by domestic laws and strategies, these initiatives reflect Bangladesh's determination to build a resilient and sustainable future.

#### 3. CLIMATE FISCAL FRAMEWORK AND CLIMATE BUDGET IN BANGLADESH

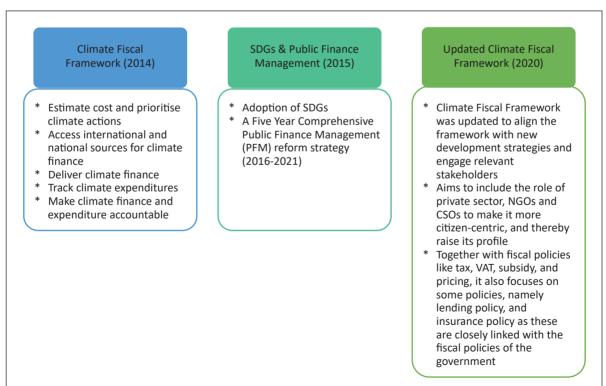
The CFF and Climate Budget in Bangladesh pioneer strategies aimed at effectively addressing climate change within the country's fiscal policies and budgetary allocations. As a vulnerable country to the adverse impacts of climate change, Bangladesh recognises the necessity of integrating climate considerations into its financial planning processes. The CFF establishes the overarching strategy for aligning fiscal decisions with climate action, ensuring that economic

priorities are intertwined with environmental resilience. Complementing this, the Climate Budget provides a detailed mechanism for tracking and allocating funds specifically for climate-related projects and initiatives. Collectively, these initiatives exemplify Bangladesh's commitment to a comprehensive approach in managing climate risks while fostering sustainable development, showcasing the potential for financial innovations to drive positive environmental outcomes.

#### 3.1 Climate Fiscal Framework in Bangladesh

In 2014, the GoB formulated the CFF for the first time in the country as per the recommendations of CPEIR. And the framework aimed at estimating costs and prioritise climate actions, accessing international and national sources for climate finance, delivering climate finances, tracking climate expenditures, and making climate finance and expenditure accountable.

Since the adoption of CFF in 2014, the government adopted the Sustainable Development Goals (SDGs) in the next year (2015) as its new development framework. In the same year, the government also adopted a five-year comprehensive Public Finance Management (PFM) reform strategy (2016-2021) with a primary objective to modernise and enhance the efficiency, transparency, and effectiveness of the country's fiscal management systems. Focusing to align financial practices with development goals, the strategy aimed to improve the allocation and utilisation of public resources. By streamlining budget processes, strengthening revenue collection mechanisms, and enhancing public procurement procedures, the strategy sought to minimise wastage, reduce corruption, and ensure public funds were directed towards priority sectors and projects. Additionally, the strategy aimed to build institutional capacity, enhance accountability, and foster a culture of prudent fiscal governance, ultimately contributing to



#### Figure 2: Climate Fiscal Framework in Bangladesh

Source: Authors' compilation.

sustainable socioeconomic growth and development in Bangladesh. In 2020, the GoB updated the CFF to align with the new development strategies and involve stakeholders. It expanded its role to include private sector, NGOs, and CSOs, and highlighted fiscal policies like tax, Value-Added Tax (VAT), subsidies, and pricing.

The Figure 2 shows how climate fiscal framework evolved over the time.

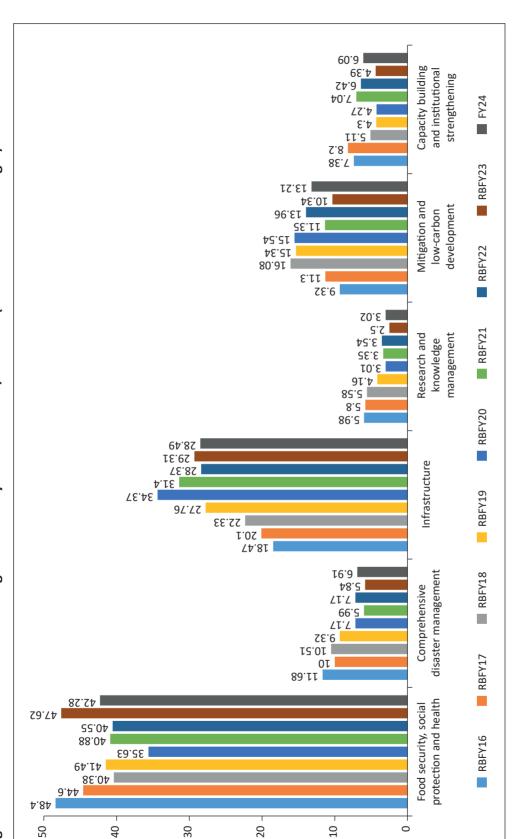
#### 3.2 Climate Budget in Bangladesh

Since the first climate budget report publication in 2017, ministries and divisions have grown over the time. The first climate budget report was published in FY17–18 following the recommendations of the CFF prepared by the Ministry of Finance (MoF). Also, in the same fiscal year, six ministries and divisions were considered to prepare the Climate Budget. These are: Ministry of Primary and Mass Education (MoPME), Local Government Division (LGD), Ministry of Agriculture (MoA), Ministry of Environment and Forest (MoEF), Ministry of Water Resources (MoWR), and Ministry of Disaster Management and Relief (MoDMR). Currently, a total of 25 ministries and divisions were considered in preparing the Climate Budget. Considering six thematic areas mentioned in the BCCSAP, the climate relevant allocations are determined from the total budgetary allocation for the projects and programmes adopted by the 25 ministries and divisions. The six thematic areas of BCCSAP are presented in Figure 3.



Figure 3: Six Thematic Areas of Bangladesh Climate Change Strategy and ActionPlan

Source: Authors' compilation based on MoEF (2009).



Source: Ministry of Finance.

#### **3.3 Budgetary Allocation under BCCSAP Thematic Areas**

The theme – food security, social protection and health is dominant in receiving share of total Climate Budget. On the other hand, research and knowledge management received the lowest allocation over the years. The highest share of Climate Budget, 42.28 pe cent in FY24 was allocated for food security, social protection, and health of BCCSAP. The lowest share of climate budget, only 3.02 per cent in FY24 was allocated for research and knowledge management. Two important thematic areas, mitigation and low-carbon development and comprehensive disaster management are not among the top Climate Budget recipients. However, the allocation for mitigation and low-carbon development increased over the years from 9.32 per cent in FY16 to 13.21 per cent in FY24. Besides, the allocation for comprehensive disaster management decreased from 11.68 per cent in FY16 to 6.91 per cent in FY24. Being vulnerable to climate change, the allocation for comprehensive disaster management for Bangladesh should be prioritised.

The figure 4 shows the trend of budgetary allocation for BCCSAP thematic areas.

#### 3.4 Utilisation of Climate Budget

Over the years, the cumulative climate change budget allocations for 25 ministries and divisions have increased. However, the budget utilisation rate has shown a fluctuating trend since FY16. In FY24, climate change related budgetary allocation accounted for 8.99 per cent of cumulative budgetary allocation for the 25 ministries and divisions. The budget allocation has decreased by 0.45 per cent in FY24 compared to the revised budget in FY23 (see annex Figure A1). Besides, climate relevant development expenditure increased from 40 per cent of total climate budget expenditure in FY16 to 62 per cent of total expenditure in FY24, a positive initiative by the GoB. In terms of climate budget utilisation, the expenditure for the climate budget in FY16 reached a utilisation rate of 94 per cent. Since then, the utilisation rate decreased over the years except in FY19 when it was 94 per cent (Figure 5). The utilisation of development expenditure remained lower than the non-development expenditure in most years.

The budget allocation for the Ministry of Environment, Forst and Climate Change (MoEFCC) has remained behind the target stated in the Eighth Five Year Plan (8FYP). The budgetary allocation for the MoEFCC is important because this ministry plays a critical role in protecting the country's natural resources, mitigating the impact of climate change, and promoting sustainable development while balancing economic growth and environmental conservation. The allocation for the MoEFCC has increased to 0.033 per cent of the Gross Domestic Product (GDP) in FY23 from 0.031 per cent in FY22, far behind the target stated in 8FYP of 0.10 per cent of GDP by 2025 and 0.5 per cent of GDP by 2041 (Figure 6).

Given the priority thematic areas, food security, social protection, and health is the most prioritised ones for the 10 ministries and divisions. Among other ministries and divisions, Ministry of Agriculture (MoA) and Ministry of Industries (MoI) have the highest allocation of 93.9 per cent and 97.22 per cent respectively under this category. One of the notable points is that the development of climate resilient cropping systems and production technologies programme received more than 95 per cent of total allocation under the BCCSAP thematic area for the MoI in FY24. However, this includes expenditures for construction of 47 new buffer warehouses (out of which 13 were approved in 2017 and 34 were approved in 2018) in various districts with the goal of facilitating fertiliser distribution and addressing damages caused by climate change. But it is contradictory with the environmental objectives because these are chemical fertilisers which are

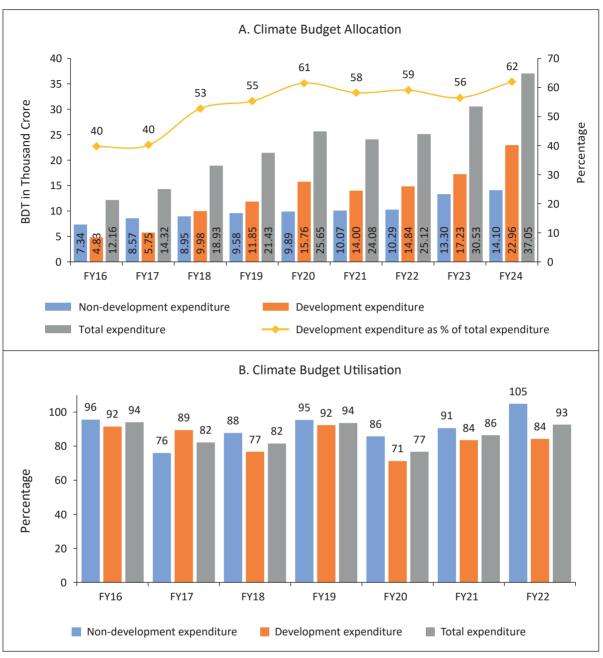


Figure 5: Climate Budget Allocation and Utilisation Over the Years

harmful for the environment and human health. Although the Mol is playing a vital role in taking the initiatives such as industrial waste treatment plants, greenhouse gas emission reduction, and assistance in climate change mitigation, the ministry only received BDT 0.38 crore or 0.15 per cent of the total climate relevant allocation for mitigation and low-carbon development.

For environmentally friendly and sustainable infrastructure, the Road Transport and Highways Division (RTHD) has an important role to play. Allocation for this division on climate relevant activities has increased to 3.22 per cent of total climate budget in FY24 from 2.14 per cent in the previous fiscal. However, allocation for the BCCSAP theme mitigation and low-carbon

Source: Ministry of Finance.

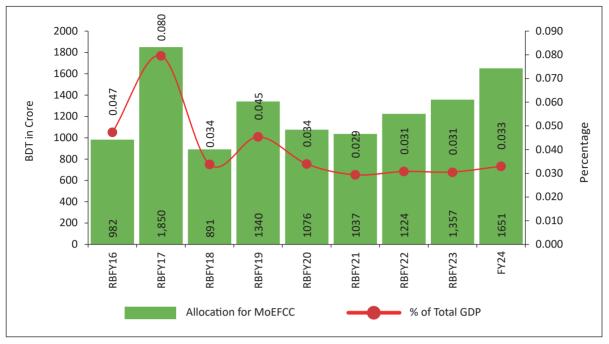
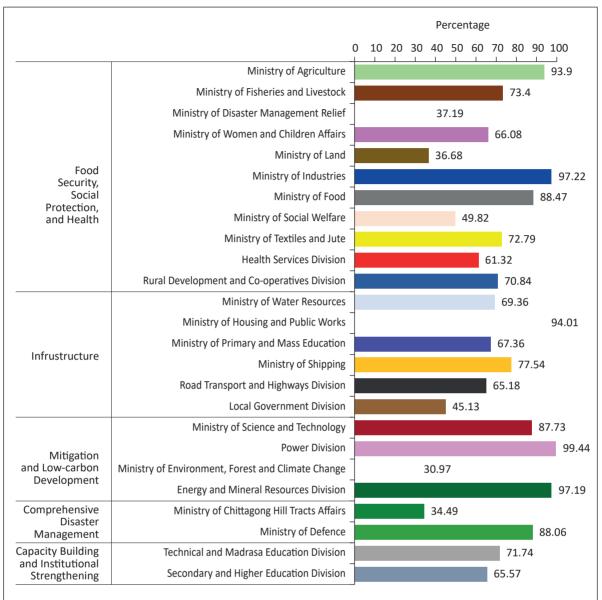


Figure 6: Budget Allocation for the MoEFCC

Source: Ministry of Finance.

development has declined drastically from 81.29 per cent (revised) of total climate change related allocation in FY22 to 21.06 per cent (revised) in FY23 and to 24.54 per cent (budget) in FY24. The priority thematic areas of 25 ministries and divisions are presented in figure 7.

Aiming to reach the goal of 40 per cent power generation from clean energy by 2041, the allocation for the Annual Development Plan (ADP) targeting renewable energy requires more allocation. Bangladesh has been investing in solar power projects, particularly through the installation of solar home systems and solar mini grids in rural areas across the country. The government has also implemented policies to promote investment in wind, biomass, and hydropower projects. The allocation for renewable energy in ADP shows a fluctuation over the years. The sector





**Source:** Ministry of Finance.

received an allocation of only 3.08 per cent in FY24, while around 97 per cent of ADP allocation was for fossil fuel-based power generation in the respective years (Table 1).

Table 1: ADP	Allocation in	Renewable	Energy and	l Fossil Fuel	Based Energy
	Anocation in	Inclue washe	Line by and	1 0 0 0 0 1 0 0 0 0 0	Duscu Energy

Fiscal Year	Allocation in Renewable Energy (%)	Allocation in Fossil Fuel (%)
FY2016	4.08	95.92
FY2017	5.22	94.78
FY2018	7.41	92.59
FY2019	3.34	96.66
FY2020	8.88	91.12
FY2021	1.42	98.58

(Table 1 contd.)

(Table 1 contd.)

Fiscal Year	Allocation in Renewable Energy (%)	Allocation in Fossil Fuel (%)
FY2022	1.55	98.45
FY2023	2.91	97.09
FY2024	3.08	96.92

Source: Ministry of Planning.

Another aspect of climate budget is the allocation for climate focused SSNP. In FY24, BDT 6,897.85 crore was allocated for the directly affected climate vulnerable people. This was only 6.07 per cent of the total SSNP allocation. The largest allocation, totalling BDT 1,500 crore, was directed towards the Work for Money (WFM) programme under the Ministry of Disaster Management and Relief (MoDMR). This accounted for 21.75 per cent of the overall allocation for climate focused SSNP (Table 2). Recognising the need to address climate change-induced migration as outlined in the NAP and the MCPP, it is imperative to further extend the climate-focused SSNP allocation.

Table 2: SSNP Allocations for the Direct Climate Vulnerable People in FY24

Programme Name	Implementing agency	Allocation
(in BDT/ crore)		
Work For Money (WFM)	MoDMR	1,500.00
Test Relief (TR) (Cash)	MoDMR	1,450.00
Vulnerable Group Feeding (VGF)	MoDMR	1,089.80
Food For Work (FFW))	MoDMR	991.97
Gratuitous Relief (Food)	MoDMR	648.68
Construction of the Multiple Disaster Shelters	LGD	418.71
Construction of Flood Shelter in the Flood and River Erosion Prone Areas	MoDMR	250.00
Relief Goods	MoDMR	180.00
Char Development and Settlement Project-bridging	MoWR	117.58
Relief Works (Flood, Drought, Cyclone and Others)	MoDMR	80.20
Gucchagram (Climate Victims Rehabilitation) Project	MoEFCC	59.35
Flood Management and Livelihood Improvement Project in Char/Haor Areas	MoWR	44.07
Disaster Grant	MoDMR	40.00
Housing Support for Homeless People/House grant	MoDMR	27.50
Total		6,897.85 (6.07 per cent of total SSNP in FY24)

Source: Ministry of Finance.

The establishment of a CFF and the integration of Climate Budgeting in Bangladesh mark significant steps towards addressing the multifaceted challenges of climate change. Although

the allocation for climate-related budget increased over the years, the budget utilisaiton has remained a concerning fact for the country. Though Bangladesh has taken significant steps in developing a Climate Budget to address the challenges posed by climate change, the problem of monitoring remains a critical concern. The effectiveness of climate finance allocation and the impacts of climate-related projects hinge on robust monitoring and evaluation systems. Addressing this challenge is essential to ensure that funds are used efficiently and that the country can track progress towards its climate resilience and mitigation goals.

#### 4. ASSESSMENT COHERENCE, IMPLEMENTATION, AND ADEQUACY

Aligning relevant policies, government initiatives, and progress on climate change in Bangladesh is a pivotal undertaking in a nation which is highly vulnerable to the adverse impacts of climate change. As the GoB strives to navigate this complex landscape, it is essential to harmonise policies across various sectors to ensure a unified approach to climate mitigation and adaptation. The government initiatives must align seamlessly with the climate objectives, fostering resilience, reducing emissions, and promoting sustainable development. The convergence of these elements forms the foundation of Bangladesh's response to climate change, determining its ability to safeguard its people and natural resources while advancing towards a sustainable, climate-resilient future.

#### 4.1 Aligning Policy and GoB Initiatives, Measures, and Progress

As medium and long-term strategies, the government is committed to undertake the following activities:

*Mobilising Resources for CCTF:* The GoB has pledged to increase the CCTF by over BDT 8,000 crore in the 8FYP. However, the current balance is just over BDT 1,435.90 crore. It indicates a pressing need for immediate financial resources to address climate-related challenges, ensure sustainable development, and protect vulnerable communities across the country from the detrimental climate change impacts.

Utilising the Green Climate Fund (GCF): The GCF provides significant climate financing to developing countries like Bangladesh, aiding in adaptation and mitigation initiatives. As of June 2023, Bangladesh received USD 374 million to support seven projects enhancing climate resilience and sustainable development. These projects, funded by the GCF, are instrumental in enhancing the country's climate resilience and advancing its sustainable development goals.

Increased Oversight of the Climate Change Fund: The commitment to implement third-party monitoring of the CCTF in Bangladesh is a significant step towards ensuring transparency, accountability, and the responsible utilisation of climate finance resources. By engaging independent entities to oversee and evaluate the implementation of the projects funded by the CCTF, the government demonstrates its dedication to preventing any potential misuse of funds. At the same time, it ensures investments are channelled into productive and effective climate change adaptation and mitigation initiatives.

Formulation and Advancement of NAP: The NAP is emerging as a critical strategic document within the framework of the United Nations Framework Convention on Climate Change (UNFCCC) for developing countries like Bangladesh. The plan integrates climate change adaptation into

policies, programmes, and activities. Bangladesh's submission of its first NAP in 2022 showcases its proactive approach to addressing climate change impacts. The NAP assures climate action aligns with broader national development goals, demonstrating the nation's commitment to sustainable development.

Improved Understanding of Climate Change in the Local Government: The GoB is enhancing its capacity to adapt to climate change by understanding its impacts on local communities. A multi-donor initiative involving the government, United Nations Development Programme (UNDP), United Nations Capital Development Fund (UNCDF), European Union (EU), and Swedish International Development Cooperation Agency (SIDA) aims to empower vulnerable communities, Local Government Institutions (LGI), and Civil Society Organisations (CSOs) to plan and finance climate change adaptation solutions. This collaborative effort ensures context-specific, inclusive, and responsive strategies, strengthening local resilience and contributing to global efforts.

Addressing Climate Change Induced Migration: The efforts of Bangladesh to combat climate change-induced migration are significant, with provisions in strategic plans like the NAP and MCPP. However, the government's allocation of only 6.07 per cent of the SSNPs budget for climate-vulnerable people raises concerns about meeting their needs. Given the severe impacts of climate change on displacement and livelihoods, a more substantial allocation of resources is required.

*Commitment to Renewable Energy:* By 2041, Bangladesh aims to cut Carbon Dioxide (CO2) emissions by 40 per cent through increasing power generation from renewable sources. However, the current budgetary allocation for renewable energy is inadequate, and to meet this target, the government needs to raise allocation for renewable energy infrastructure, such as solar, wind, and hydropower projects. Simultaneously, adequate funding is a must for reducing carbon emissions and transitioning to a more sustainable energy mix.

*Gender Focus of Climate Action:* The Bangladesh Climate Change and Gender Action Plan (ccGAP) has been updated and is awaiting policymakers' approval. The plan prioritises gender-transformative climate action, ensuring equitable distribution of impacts among all societal segments, including women and marginalised communities. The active involvement of policymakers' highlights the importance of gender equality and climate resilience in the development agenda of Bangladesh.

Development Resource Allocation for Improving the Capacity of MoEFCC: The MoEFCC in Bangladesh is focusing on increasing the ADP allocation for environmental and climate change in the 8FYP. However, the proposed ADP allocation consistently falls behind the target, potentially hindering the effective implementation of environmental and climate policies. In FY24, BDT 8.51 billion was allocated for the MoEFCC against the target of BDT 15.50 billion (0.59 per cent of total proposed ADP allocation) stated in the 8FYP. This was 0.32 per cent of total proposed ADP allocation (Table 3). Adequate funding is crucial for climate adaptation, mitigation, biodiversity conservation, and environmental regulation enforcement.

Allocation	FY21	FY22	FY23	FY24	FY25
Proposed Allocation in 8FYP					
(BDT billion Current Prices)	9.40	11.50	13.30	15.50	18.60
As a Share of ADP Allocation (%)	0.46	0.51	0.54	0.59	-
Proposed Allocation in the Budget (BDT billion Current Prices)	5.99	5.42	7.39	8.51	-
As a Share of Proposed ADP Allocation (%)	0.29	0.24	0.30	0.32	-

#### Table 3: Proposed ADP Allocation in 8FYP and Actual ADP Allocation in the Budget

Source: Authors' calculations from MoF and GED (2020).

#### 4.2 Methodology for Tracking Climate Finance and Climate Budget Formulation

The Climate Public Finance Tracking (CPFT) is a financial planning tool designed to understand a country's commitment to climate change. Bangladesh published its first CPFT in 2018, offering a comprehensive view of public finances' contribution to climate resilience and sustainability goals (see annex Figure A2). Since 2018–19, the Finance Division under the MoF has quantified climate finance in the Climate Budget Report using the built-in CPFT methodology in the Integrated Budget and Accounting System (iBAS++). Bangladesh adopted a hybrid approach, 'Objective-Based Cost Component Approach' in 2018.

The climate finance tracking methodology can be devised into five systematic steps (Figure 8).

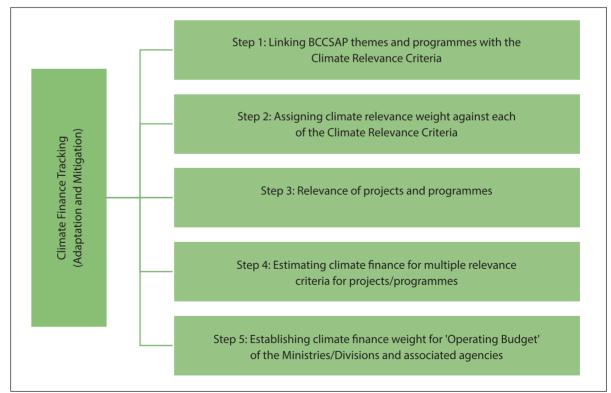


Figure 8: The Climate Finance Tracking Methodology

Source: Finance Division, Ministry of Finance (2018).

Step 1: Linking BCCSAP Themes and Programmes with the Climate Relevance Criteria.

This includes developing guidance for identifying what is and what is not climate relevant, typically drawing on the national climate change policy.

#### Step 2: Assigning climate relevance weight against each of the Climate Relevance Criteria.

Assessing and weighting the climate relevance of those expenditures is critical. Therefore, this step identifies key relevant interventions under each climate relevance criteria and rates each of those in terms of climate sensitivity, climate change relevance and the relevance weight for key interventions is then calculated by deducting the assigned weight for climate sensitivity from the weight for the climate change dimension of an intervention.

#### Step 3: Relevance of Projects and Programmes.

In this step, the relevance of project and programmes with climate change is determined by following a standard procedure.

*Step 4: Estimating climate finance for multiple relevance criteria for projects/programmes.* 

In this step, climate finance is estimated for multiple relevance criteria using weighted reciprocal rank for multiple relevance criteria.

*Step 5: Establishing climate finance weight for 'Operating Budget' of the Ministries/Divisions and associated agencies.* 

At the final stage, climate relevant weight is established for operating cost of the relevant ministries and division.

It is worth noting that only public finance has been considered for tracking at this stage. There is a scope in the methodology to incorporate tracking of private sector financing if it is introduced to the system. Besides, the BCCSAP thematic areas are well defined in the CPFT. However, there has not been a clear understanding of linking of the BCCSAP themes and programmes with the climate relevance criteria. The distribution of weight for climate change relevance requires more rationalisation rather than perspectives. Due to the obscure nature of the methodology, it is very difficult to understand the tracking system of climate finance for relevant projects and programmes under the 25 ministries and divisions.

Bangladesh made a significant step in formulating the fiscal framework aligned with existing policy measures to make the key entry points to green budgeting. The country has integrated a few components (i.e., tagging green expenditure) of green PFM. However, the country needs a comprehensive green PFM to ensure budget execution and accountability, and public participation at all stages.

Green PFM represents a pivotal shift in the realm of public finance, where traditional fiscal practices are harmonised with climate sensitive policies. This innovative approach acknowledges that financial decisions made by governments at all levels have profound implications for climate and environment and, consequently, the well-being of present and future generations. Green PFM is not just a theoretical concept; it is a practical and strategic framework designed to align

public expenditure, revenue generation, and budgetary processes with ecological imperatives. By integrating sustainability considerations into financial decision-making, the green PFM aims to integrate government strategy to combat climate change, foster responsible resource allocation, reduce environmental degradation, and ultimately contribute to a more sustainable and resilient future for our planet.

# 5. RECOMMENDATIONS FOR CLIMATE PUBLIC FINANCE MANAGEMENT IN BANGLADESH

In light of the review of legal and policy frameworks on climate change and climate budget in Bangladesh, this study makes the following recommendations for Climate PFM in the country.

- Although Bangladesh has laid the foundation for green PFM mechanism by formulating necessary policies and initiatives, the country needs to design and implement a comprehensive green PFM. Bangladesh has developed policies and initiatives to incorporate sustainability principles into its financial practices, aiming to address environmental concerns. However, to fully realise the potential of green PFM, the country must design and implement a comprehensive framework that includes evaluating public expenditures' environmental impact and establishing mechanisms for monitoring green initiatives. This will promote economic resilience and social well-being and represent a crucial step in harmonising fiscal policies with climate imperatives globally.
- Capacity development is crucial for project designing in mobilisation of resources for dealing climate change challenges in Bangladesh. The proactive pursuit of Bangladesh for climate finance is commendable. However, to effectively address climate change and maximise the use of available resources, the country should prioritise the development of bankable projects with expert support, invest in capacity development, and expedite the mobilisation of resources for its climate change trust fund. This concerted effort will not only bolster Bangladesh's resilience to climate change but also position it as a leader in climate action within the Climate Vulnerable Forum (CVF) community.
- The enhancement of the utilisation of the development climate budget in Bangladesh is crucial for effectively addressing the pressing challenges posed by climate change in the country. The enhancement requires a multi-pronged approach that includes project preparation, capacity building, streamlined processes, transparency, public engagement, private sector involvement, international co-operation, and a balanced focus on adaptation and mitigation. By implementing these strategies, Bangladesh can effectively address its climate vulnerabilities and build resilience for a sustainable future.
- The project tagging in various BCCSAP thematic areas are weighted following objectivebased method which warrants more clarity. The utilisation of an objective-based method for project tagging in various thematic areas of the BCCSAP is a commendable approach. However, it is essential to ensure that the process is transparent and provides clarity to all stakeholders involved. Bangladesh can enhance the clarity, transparency, and effectiveness of the objective-based project tagging method within the BCCSAP framework. This will not only ensure that projects are aligned with climate objectives but also build trust among the stakeholders and foster greater accountability in climate action.
- Integrating private sector financing into CPFT system in Bangladesh is a major step in addressing climate change effectively. Private sector investments can play a significant role in financing climate-resilient and sustainable projects. Bangladesh can tap into the vast potential of private sector finance to enhance its climate resilience and sustainability efforts. At present, only public financing is integrated into the iBAS++ system in Bangladesh.

Integrating the tracking system of private sector financing flow into the current iBAS++ system will not only diversify funding sources but also bring innovation and expertise to the country's climate initiatives.

- Climate budgeting should be reformed to be considered as an all-inclusive strategy aligned with national priorities. Reforming climate budgeting in Bangladesh to make it an all-inclusive strategy aligned with national priorities is an important measure in effectively addressing the challenges of climate change. By reforming climate budgeting, Bangladesh can better integrate climate considerations into its national development agenda, enhance resilience, and effectively allocate resources to address the pressing challenges of climate change. This holistic approach will not only strengthen the country's ability to adapt to a changing climate but also promote sustainable development and economic growth.
- Integrating climate budgeting reform with PFM reform is a strategic approach to significantly enhance the effectiveness and efficiency of both processes. To successfully integrate climate budgeting reform with the PFM reform, the government should establish clear frameworks, guidelines, and co-ordination mechanisms. This includes involving relevant government departments, ministries, and stakeholders to ensure that climate considerations are integrated into the broader fiscal management landscape. Through this particular measure, the government can maximise the impact of climate finance, improve financial accountability, and advance their climate resilience and sustainability goals.

The MoF should be in charge to drive climate budgeting reforms. Other ministries should be part of the reform process to establish their ownership in the reformation. Broader stakeholders including the private sector, NGOs, CSOs and community-based organisations should also be engaged in the formulation and implementation of climate budget reforms. For better integration of climate budget tagging into the national budget process, and for better tracking of climate related expenditures, capacity development of relevant human resources is essential.

#### 6. CONCLUSION

The adoption of Green PFM is proposed as a strategic tool to align fiscal policies with climate and environmental objectives. This working paper explores Bangladesh's legal and policy framework on climate change and the climate budget, providing recommendations for enhanced climate public finance management. Amid these challenges, the call for swift, effective, and sustainable climate action remains imperative to safeguard the well-being of millions of people facing the constant threat of a changing climate.

The study emphasises the need for Bangladesh to go beyond its foundational green PFM policies by implementing a comprehensive framework that evaluates the environmental impact of public expenditures, fostering economic resilience and social well-being on a global scale. The MoF is identified as the key driver of climate budgeting reforms, with the engagement of other ministries and broader stakeholders essential for effective implementation. Capacity development for relevant human resources is crucial for better integration of climate budget tagging into the national budget process and improved tracking of climate-related expenditures. Overall, the study underscores the significance of strategic reforms and collaboration to address the urgent challenges of climate change in Bangladesh, and promote sustainable development.

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#### ANNEX

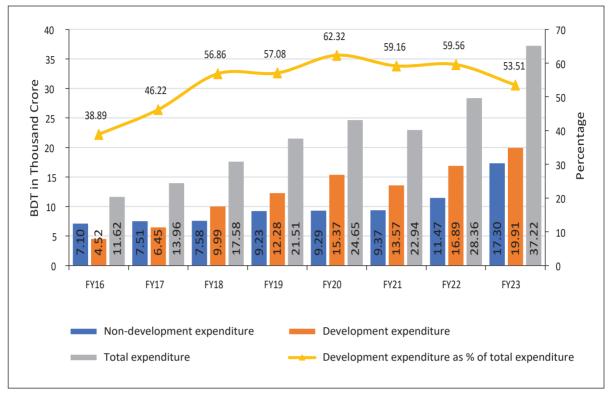
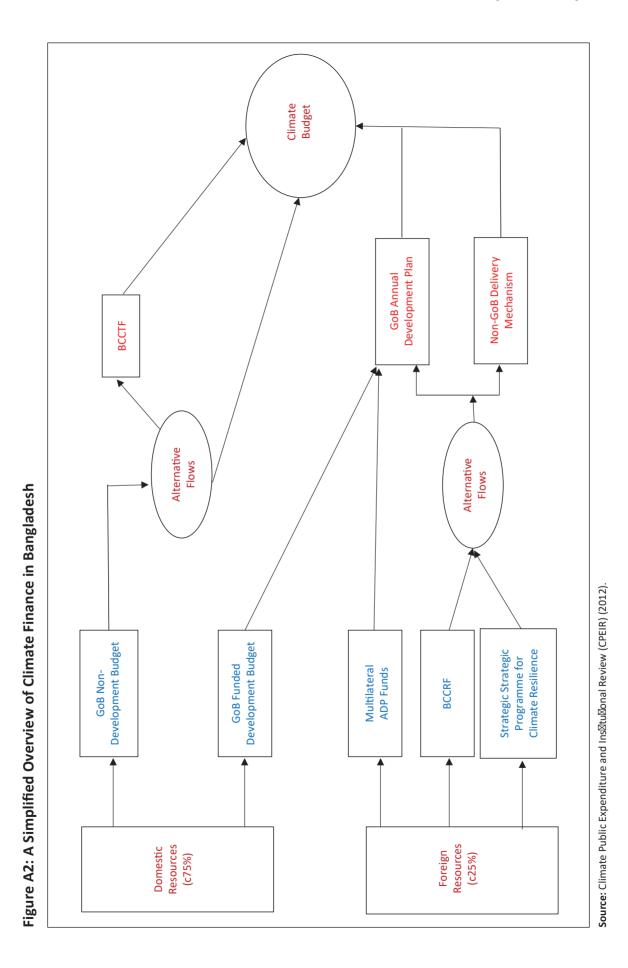


Figure A1: Revised Climate Budget Alloca Mon

Source: Ministry of Finance.



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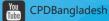
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